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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION and
PACIFIC GAS AND ELECTRIC
COMPANY,

Chapter 11 (Lead Case) (Jointly Administered)

Debtors.

**NOTICE PURSUANT TO 11 U.S.C.
§ 546(b)(2) RELATED TO PERFECTION,
MAINTENANCE AND ENFORCEMENT
OF MECHANICS LIEN CLAIMS**

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

■ Affects both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088 (DM)

**HYDROCHEM'S NOTICE OF PERFECTION, MAINTENANCE AND ENFORCEMENT
OF MECHANICS LIEN CLAIMS PURSUANT TO
BANKRUPTCY CODE SECTION 546(b)(2)**

PLEASE TAKE NOTICE THAT pursuant to section 546(b)(2) of title 11 of the United States Code (11 U.S.C. §§ 101 *et seq.*, the “Bankruptcy Code”), HydroChemPSC, Hydrochem, LLC and other affiliated entities (collectively the “HydroChem Entities”) hereby provide notice of mechanics liens, corresponding secured claims, and enforcement rights held one or more of the HydroChem Entities against property of one or both of the above-referenced debtors (the

1 “(Debtors)” and (ii) reserve all related and other rights, claims and interests they may have in the
2 subject Chapter 11 cases.

3 **PLEASE TAKE FURTHER NOTICE THAT** one or more of the HydroChem Entities
4 filed certain lien statements (the “Lien Statements”) reflecting properly recorded and perfected
5 mechanics liens against certain property owned by one or both of the Debtors. True and correct
6 copies of the Lien Statements are attached hereto as **Exhibit A**.

7 **PLEASE TAKE FURTHER NOTICE THAT** pursuant to and consistent with
8 Bankruptcy Code sections 362(b)(3) and 546(b)(1), one or more of the HydroChem Entities filed
9 the Lien Statements and hereby give notice of their lien interest in all of the property that is
10 subject to the liens, its corresponding secured claims, and its enforcement rights against the
11 property, within the time fixed by California law for the commencement of an action to enforce
12 its mechanics lien rights. The HydroChem Entities have filed this single Notice in the above-
13 captioned Chapter 11 cases intending it to apply or pertain separately and individually to (a) the
14 continued perfection of each and every one of the subject liens set forth in the Lien Statements,
15 (b) the actions that otherwise would have been commenced by one or more of the HydroChem
16 Entities in accordance with California state law to maintain, enforce and realize upon their
17 corresponding secured claims and (c) the HydroChem Entities’ exercise of any other rights under
18 or satisfaction of any other requirements of Bankruptcy Code section 546(b)(2) in the
19 circumstances. The HydroChem Entities reserve all of their rights under applicable state and
20 federal law.

21 Dated: April 24, 2019

Pepper Hamilton LLP

22 _____
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